

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE TALKSPACE, INC. SECURITIES  
LITIGATION

Case No.: 1:22-cv-00163-PGG

**ORAL ARGUMENT REQUESTED**

**NOTICE OF DEFENDANTS' MOTION TO DISMISS  
THE CONSOLIDATED CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss the Consolidated Class Action Complaint, the Declaration of Allison S. Markowitz (with exhibits), and such other submissions as may be filed in support of this Motion, Defendants Talkspace, Inc., Hudson Executive Capital LP, HEC Sponsor LLC, HEC Master Fund LP, Douglas L. Braunstein, Douglas G. Bergeron, Jonathan Dobres, Robert Greifeld, Amy Schulman, Thelma Duggin, Oren Frank, and Mark Hirschhorn, by and through their undersigned counsel, will move this Court, before the Honorable Paul G. Gardephe, at the Thurgood Marshall United States Courthouse located at 40 Foley Square, New York, New York, on a date and time to be set by the Court, for an order: (i) dismissing the Consolidated Class Action Complaint in its entirety and with prejudice pursuant to Rules 9(b) and 12(b)(6) of the Federal Rules of Civil Procedure and the Private Securities Litigation Reform Act of 1995; and (ii) for such other relief as the Court deems just and proper.

DATED: September 13, 2022  
New York, New York

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